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15 *Attorneys for Debtors and Debtors in Possession*

16 **UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC  
COMPANY,**

21 **Debtors.**

22  Affects PG&E Corporation  
23  Affects Pacific Gas and Electric Company  
24  Affects both Debtors

25 \* *All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

26 Bankruptcy Case  
No. 19-30088 (DM)

27 Chapter 11  
(Lead Case) (Jointly Administered)

28 **STIPULATION AND AGREEMENT FOR  
ORDER CONTINUING HEARING ON  
MOTION PURSUANT TO FED. R.  
BANKR. P. 9006(B)(1) TO ENLARGE THE  
TIME FOR ACWA/JPIA TO FILE PROOF  
OF CLAIM**

[Relates to Dkt. Nos. 5215-5217]

Regarding Motion Set for Hearing  
February 26, 2020 at 10:00 a.m. PST

1        This stipulation (the “**Stipulation and Agreement for Order**”) is entered into by and  
2    between PG&E Corporation and Pacific Gas and Electric Company (collectively, the  
3    “**Debtors**”), as debtors and debtors in possession in the above-captioned cases (the “**Chapter 11**  
4    **Cases**”), on the one hand, and the Association of California Water Agencies Joint Powers  
5    Insurance Authority (the “**ACWA/JPIA**”), on the other hand. The Debtors and the ACWA/JPIA  
6    are referred to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and  
7    each as a “**Party**.” The Parties hereby stipulate and agree as follows:

## RECITALS

9           A.       On December 27, 2019, the ACWA/JPIA filed the *Motion Pursuant to Fed. R.*  
10           *Bankr. P. 9006(b)(1) to Enlarge the Time for ACWA/JPIA to file Proof of Claim* [Dkt. 5215] (the  
11           “**Motion**”), and the Notice of Hearing on the Motion [Dkt. 5217], which scheduled a hearing on  
12           the Motion (the “**Hearing**”) for February 26, 2020 at 10:00 a.m. PST.

13        B.        In the Motion, the ACWA/JPIA seeks an order expanding the time for it to file a  
14 proof of claim, attached as Exhibit 1 to the Motion, in these Chapter 11 Cases.

15 C. The Parties are conferring regarding a potential resolution to the Motion, and  
16 desire to adjourn the Hearing while they continue those discussions.

17 NOW, THEREFORE, IT HEREBY IS STIPULATED AND AGREED BY AND  
18 BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES  
JOINTLY REQUEST THE COURT TO ORDER, THAT:

19                   1. This Stipulation shall be effective upon entry of an order by this Court  
20 approving it.

21                   2. The February 26, 2020 Hearing shall be continued to March 10, 2020 at  
22 10:00 a.m. PST.

23                   3. The deadline to file any responses to the Motion is continued to March 3,  
24 2020.

25           4. This Court shall retain jurisdiction to resolve any disputes or controversies  
26 arising from this Stipulation and Agreement for Order or the order approving it.

Dated: February 18, 2020

*/s/ Matthew Goren*  
Matthew Goren  
*Attorneys for Debtors  
and Debtors in Possession*

Dated: February 18, 2020

/s/ Sander L. Esserman  
Sander L. Esserman

*Attorneys for the Association of California  
Water Agencies Joint Powers Insurance  
Authority*

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